

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

Antonio Solis, Jose Solis, and Juan Rangel, individually and on behalf of
all other similarly situated,

Plaintiffs,

v.

**Hilco Redevelopment LLC, HRE
Crawford LLC, HRP Exchange 55
LLC, MCM Management Corp.,
Controlled Demolition, Inc., and
Marine Technology Solutions LLC,**

Defendants.

No. 20 C 2348

Hon. Martha M. Pacold,
District Judge

Hon. Sunil R. Harjani,
Magistrate Judge

Joint Status Report

Pursuant to the Court's order of June 1, 2021 (Dkt. 129), the parties jointly submit the following status report, stating as follows:

1. The parties are continuing to conduct written discovery, including conferring about Plaintiffs' discovery requests. Since the previous status report, the parties were able to reach agreement on certain issues pertaining these requests, while they continue to confer on others.

2. The parties reached agreement on a protocol for the discovery of electronically stored information (Dkt. 132), and have begun reviewing the documents that resulted from the application of that protocol.

3. Defendants are continuing to review Plaintiffs' comments on the proposed confidentiality order. To facilitate document production while these

discussions are ongoing, the parties have agreed to treat as confidential documents so designated even before entry of a confidentiality order.

4. As noted in the last status report, Defendant MTS provided a waiver so that Plaintiffs could request MTS's emails from Microsoft Corporation. Plaintiffs served a subpoena on Microsoft along with the signed waiver. Microsoft refused to comply with Plaintiffs' subpoena until MTS signed a different waiver, using Microsoft's preferred form. MTS subsequently signed that form, but only for one of its email accounts. Plaintiffs provided that signed waiver to Microsoft. Without prejudice to later moving to compel MTS to sign a broader waiver or moving to enforce their subpoena, Plaintiffs intend to review the initial set of emails they receive from Microsoft to determine whether they need additional emails from MTS and whether additional motion practice may be necessary with respect to this issue.

5. Plaintiffs are conferring with third parties the Illinois Environment Protection Agency and the City of Chicago regarding Plaintiffs' document subpoenas. With respect to the Illinois EPA subpoena, the EPA has agreed to produce responsive documents and is presently conducting a privilege review. Regarding the subpoena to the City of Chicago, Plaintiffs are continuing to confer regarding the City's response.

6. The parties have not engaged in settlement discussions in this case.

July 29, 2021

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Jon Loevy

Respectfully submitted,

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